

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

PETER KALTMAN, Individually And On  
Behalf Of All Others Similarly Situated,

Plaintiff,

vs.

PETRÓLEO BRASILEIRO S.A. –  
PETROBRAS,

Defendant.

Civil Action No. 14-cv-9662 (JSR)

*(captions continue on the following page)*

**NOTICE OF THE MOTION OF THE SKAGEN-DANSKE GROUP FOR  
CONSOLIDATION OF RELATED ACTIONS, APPOINTMENT AS LEAD PLAINTIFF,  
AND APPROVAL OF ITS SELECTION OF COUNSEL**

KEN NGO, Individually And On Behalf Of All  
Others Similarly Situated,

Plaintiff,

vs.

PETRÓLEO BRASILEIRO S.A. –  
PETROBRAS,

Defendant.

Civil Action No. 14-cv-9760 (JSR)

JONATHAN MESSING, Individually and On  
Behalf of All Others Similarly Situated,

Civil Action No. 14-cv-9847 (JSR)

Plaintiff,

vs.

PETRÓLEO BRASILEIRO S.A. –  
PETROBRAS,

Defendant.

*(captions continue on the following page)*

CITY OF PROVIDENCE, Individually and on Behalf of All Others Similarly Situated,

Plaintiff,

vs.

PETRÓLEO BRASILEIRO S.A. – PETROBRAS, PETROBRAS GLOBAL FINANCE B.V., MARIA DAS GRAÇAS SILVA FOSTER, ALMIR GUILHERME BARBASSA, MARIÂNGELA MONTEIRO TIZATTO, JOSUÉ CHRISTIANO GOMES DA SILVA, DANIEL LIMA DE OLIVEIRA, JOSÉ RAIMUNDO BRANDÃO PEREIRA, SÉRVIO TÚLIO DA ROSA TINOCO, PAULO JOSÉ ALVES, GUSTAVO TARDIN BARBOSA, ALEXANDRE QUINTÃO FERNANDES, MARCOS ANTONIO ZACARIAS, CORNELIS FRANCISCUS JOZEF LOOMAN, THEODORE MARSHALL HELMS, BB SECURITIES LTD., CITIGROUP GLOBAL MARKETS INC., ITAÚ BBA USA SECURITIES, INC., J.P. MORGAN SECURITIES LLC, MORGAN STANLEY & CO. LLC, SANTANDER INVESTMENT SECURITIES INC., BANCO VOTORANTIM NASSAU BRANCH, MITSUBISHI UFJ SECURITIES (USA), INC., HSBC SECURITIES (USA) INC., MERRILL LYNCH, PIERCE, FENNER & SMITH INCORPORATED, STANDARD CHARTERED BANK, BANK OF CHINA (HONG KONG) LIMITED, BANCO BRADESCO BBI S.A., BANCA IMI S.P.A., and SCOTIA CAPITAL (USA) INC.,

Defendants.

Civil Action No. 14-cv-10117 (JSR)

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LOUIS KENNEDY, Individually and on Behalf  
of All Others Similarly Situated,

Civil Action No. 15-cv-93 (JSR)

Plaintiff,

vs.

PETRÓLEO BRASILEIRO S.A. –  
PETROBRAS,

Defendant.

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PLEASE TAKE NOTICE that on February 19, 2015 at 4:00 p.m., before the Honorable Jed S. Rakoff, at the United States District Court for the Southern District of New York, located at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, Courtroom 14B, New York, New York, SKAGEN AS, Danske Invest Management A/S, and Danske Invest Management Company (collectively, the “SKAGEN-Danske Group”), by their undersigned counsel, will respectfully move this Court for entry of an Order pursuant to the Private Securities Litigation Reform Act of 1995 (“PSLRA”), 15 U.S.C. § 77z-1(a)(3)(B) and 15 U.S.C. § 78u-4(a)(3)(B): (1) consolidating all related actions; (2) appointing the SKAGEN-Danske Group as Lead Plaintiff; and (3) approving the SKAGEN-Danske Group’s selection of Kessler Topaz Meltzer & Check LLP (“Kessler Topaz”) and Bernstein Litowitz Berger & Grossmann LLP (“Bernstein Litowitz”) as Co-Lead Counsel for the class.

This Motion is made on the grounds that the SKAGEN-Danske Group is the “most adequate plaintiff” pursuant to the PSLRA and should therefore be appointed Lead Plaintiff. Specifically, the SKAGEN-Danske Group believes that it has the “largest financial interest” in the relief sought by the Class in this action by virtue of, among other things, the significant losses the SKAGEN-Danske Group suffered on its investments in Petrobras securities. The SKAGEN-Danske Group also otherwise satisfies the requirements of Rule 23 of the Federal Rules of Civil Procedure because its claims are typical of other class members’ claims and because it will fairly and adequately represent the interests of the class. Moreover, the SKAGEN-Danske Group is a paradigmatic Lead Plaintiff under the PSLRA because its members are sophisticated institutional investors with substantial financial stakes in the litigation, which guarantees effective monitoring and supervision of counsel. In support of this Motion, the SKAGEN-Danske Group submits herewith the Memorandum of Law in Support of the Motion

of the SKAGEN-Danske Group for Consolidation of Related Actions, Appointment as Lead Plaintiff, and Approval of its Selection of Counsel, and the Declaration of Max W. Berger in Support of the Motion of the SKAGEN-Danske Group for Consolidation of Related Actions, Appointment as Lead Plaintiff, and Approval of its Selection of Counsel.

WHEREFORE, the SKAGEN-Danske Group respectfully requests that the Court: (1) consolidate all related actions; (2) appoint SKAGEN AS, Danske Invest Management A/S, and Danske Invest Management Company as Lead Plaintiff pursuant to the PSLRA; (3) approve the SKAGEN-Danske Group's selection of Kessler Topaz and Bernstein Litowitz to serve as Co-Lead Counsel for the class; and (4) grant such further relief as the Court may deem just and proper.

DATED: February 6, 2015

Respectfully submitted,

**BERNSTEIN LITOWITZ BERGER &  
GROSSMANN LLP**

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Class*